

BakerHostetler
600 Montgomery St.
Suite 3100
San Francisco, CA 94111
T: 415.659.2900
F: 415.659.2601
www.bakerlaw.com

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David J. Richardson
direct dial: 415.659.2583
drichardson@bakerlaw.com

VIA ECF

Honorable Dennis Montali
United States Bankruptcy Court
Northern District of California
450 Golden Gate Avenue, 16th Floor
San Francisco, CA 94102

*Re: In re PG&E Corporation and Pacific Gas and Electric Company, Case No. 19-30088
(DM) (Jointly Administered)*

Dear Judge Montali:

We are counsel to the Official Committee of Tort Claimants (the “**TCC**”) and address this letter to the Court on behalf of the TCC in response to the Official Committee of Unsecured Creditors’ Proposed Modifications to Debtors’ Plan and Confirmation Order filed on June 8, 2020 [Dkt. No. 7832] (the “**UCC Modifications**”), and in support of the letter brief filed by PG&E Corporation and Pacific Gas and Electric Company (the “**Debtors**”), on June 9, 2020 [Dkt. 7859] (the “**Letter Brief**”), which objects to the UCC Modifications.

The TCC has carefully evaluated the arguments advanced by both the Debtors and the Official Committee of Unsecured Creditors (the “**UCC**”) and concurs with the positions argued by the Debtors in their Letter Brief. The UCC Modifications go beyond the position that has been advocated by both the Debtors and the TCC in these proceedings—that claims and defenses not otherwise addressed in the Plan and Confirmation Order survive to the extent permitted under applicable law—and instead requests language in the Plan and Confirmation Order that affirmatively preserves claims and defenses regardless of applicable law.

The TCC does not object to the removal of certain Plan and Confirmation Order language that was objectionable to the UCC, and which the Debtors have agreed to delete, but objects to the proposed new language advanced by the UCC in the UCC Modifications.

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The TCC's position is not an effort to deprive litigants of potential claims or defenses. If a defense is not discharged by Section 1141, and if it follows an assigned claim as a matter of state law, then such law should control, and the Confirmation Order should not be burdened with language proposed in the UCC Modifications that appears designed to supplant applicable law rather than confirm its application.

Sincerely,

/s/ David J. Richardson

David J. Richardson

Counsel to the Official Committee of Tort Claimants